

REMARKS

Reconsideration and allowance of the subject application are respectfully requested. Claims 1-30 and 32 are pending. By this Amendment, claims 1 and 12-15 are amended. By this Amendment, no claims are added or cancelled. Claims 1 and 12-15 are the independent claims.

Perfection of Priority

Concurrently with the filing of this Amendment, Applicants have filed an English Translation of the priority document, as well as a statement that the translation is accurate. Therefore, Applicants submit that Applicants have perfected priority.

Claims Rejections - 35 USC §102

The Examiner has rejected claims 1, 12, 13, 14 and 15 under 35 U.S.C. § 102(a) as being anticipated by Kim et al. (U.S. Patent Application Publication No. 2004/0068606, hereinafter “Kim”). Applicants respectfully traverse this rejection for the reasons detailed below.

Because Applicants have perfected priority, Applicants submit that Kim is not a reference under 35 U.S.C. §102(e). For instance, the critical filing date of Kim under 35 U.S.C. §102(e) is June 19, 2003. The correct priority date of the present application is **November 22, 2002**. Because the critical filing date of June 19, 2003 of Kim is after the priority date of November 22, 2002 of the present application, Kim cannot be applied as a reference under 35 U.S.C. §102(e). In addition, Kim does not

quality for a reference under any other section of 102. Therefore, Applicants respectfully request the Examiner to withdraw this rejection.

Claims Rejections - 35 USC §103

Claims 2, 3, 16-19, 22, 25, 28 and 32

The Examiner has rejected claims 2, 3, 16-19, 22, 25, 28 and 32 under 35 U.S.C. § 103(a) as being unpatentable over Kim in view of Kaneshige (U.S. Patent No. 6,360,055, hereinafter “Kaneshige”). Because Kim does not qualify as a prior art reference under 35 U.S.C. §102, Kim cannot be applied under 35 U.S.C. §103(a). As such, Applicants respectfully request his rejection be withdrawn.

Claims 4-11, 20-21, 23-24, 26-27 and 29-30

The Examiner has rejected claims 4-11, 20-21, 23-24, 26-27 and 29-30 under 35 U.S.C. § 103(a) as being unpatentable over Kim in view of Kaneshige and Inoshita et al. (U.S Patent No. 7,024,102, hereinafter “Inoshita”). Because Kim does not qualify as a prior art reference under 35 U.S.C. §102, Kim cannot be applied under 35 U.S.C. §103(a). As such, Applicants respectfully request his rejection be withdrawn.

CONCLUSION

In view of above remarks and amendments, reconsideration of the outstanding rejection and allowance of the pending claims is respectfully requested.

If the Examiner believes that personal communication will expedite prosecution of this application, the Examiner is invited to telephone the undersigned at number listed below.

If necessary, the Commissioner is hereby authorized in this, concurrent, and future replies to charge payment or credit any overpayment to Deposit Account No. 08-0750 for any additional fees required under 37 C.F.R. §§ 1.16 or 1.17; particularly, extension of time fees.

Respectfully submitted,

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